

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAWAII CHILDREN'S BLOOD)	CIVIL NO. CV03-00708 SOM-LEK
AND CANCER GROUP,)	(Other Civil Action)
)	
Plaintiff,)	DECLARATION OF KENNETH S.
)	ROBBINS
vs.)	
)	
HAWAII PACIFIC HEALTH;)	
KAPI'OLANI MEDICAL)	
SPECIALISTS; KAPI'OLANI)	
MEDICAL CENTER FOR)	
WOMEN AND CHILDREN,)	
)	
Defendants.)	
)	
)	
)	

DECLARATION OF KENNETH S. ROBBINS

I, KENNETH S. ROBBINS, make the following declaration on personal knowledge and am competent to testify to the matters stated therein.

1. I am an attorney licensed to practice in all courts in the state of Hawaii.

2. I make this declaration on personal knowledge of the facts set forth in this declaration and am competent to testify to the matters stated therein.

3. I am the lead defense counsel for Defendants HAWAII

PACIFIC HEALTH, KAPĪOLANI MEDICAL CENTER FOR WOMEN
AND CHILDREN AND KAPĪOLANI MEDICAL SPECIALISTS
(collectively referred to as "HPH Defendants").

4. Attached hereto as Exhibit "A" is a true and accurate copy of the July 6, 2007 Minute Order in Woodruff, et al. vs. Hawai'i Pacific Health et al., Civil No. 02-1-0090-01, First Circuit Court (BIA).

5. Attached hereto as Exhibit "B" is a true and accurate copy of this Court's Order Denying Defendants' Motion to Dismiss, and Granting Defendants' Alternative Motion to Stay Proceedings Pending Resolution of the Concurrent State of Hawai'i Circuit Court Case, filed October 22, 2004.

6. Attached hereto as Exhibit "C" is a true and accurate copy of the First Amended Complaint in the instant Federal Action.

7. Attached hereto as Exhibit "D" is a true and accurate copy of the Second Amended Complaint in Woodruff, et al. v. Hawai'i Pacific Health, et al., Civil No. 02-1-0090-01, First Circuit Court (BIA).

8. Attached hereto as Exhibit "E" is a true and accurate copy of pages 28-30 of the First Amended Complaint in Woodruff, et al. v. Hawai'i Pacific Health, et al., Civil No. 02-1-0090-01, First Circuit Court (BIA).

9. Attached hereto as Exhibit "F" is a true and accurate copy of a transcript of the January 19, 2006 proceedings before Hon. Susan Oki Mollway in the instant Federal Action.

10. Attached hereto as Exhibit "G" is a true and accurate copy of a transcript of the June 16, 2006 proceedings before Hon. Susan Oki Mollway in the instant Federal Action.

I declare under penalty of law that the foregoing statements are true and correct.

DATED: Honolulu, Hawaii, July 23, 2007.

/s/ Kenneth S. Robbins
KENNETH S. ROBBINS